

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. s-1 4:18 CR 590 ERW (JMB)
)	
JAMES FLANNEL,)	
)	
Defendant.)	

**UNITED STATES OF AMERICA'S
FIRST NOTICE OF AND MOTION FOR
DESIGNATION OF MATTER AS A COMPLEX CASE**

COMES NOW the United States of America and respectfully requests that this Court find this matter to be a complex case within the meaning of Title 18, United States Code, Section 3161(h)(7)(B)(ii).

In support of its request, the United States respectfully suggests that, among other things, the complexity of the factual issues and the nature of the prosecution, make it unreasonable to expect adequate preparation for pretrial proceedings and for the trial itself within the time limits established by Section 3161.

For example, this matter relates to the June 25, 2018, murder of one individual as well as multiple other offenses committed on the same date and after by the defendant while in the possession of a firearm. There is extensive discovery, including police reports, witness interviews and forensic examinations (among other things), related to the multiple crime scenes and the alleged illegal activity undertaken by defendant.

Similarly, as a result of some of these acts, the defendant has been charged with death-penalty eligible offenses (possession of a firearm in furtherance of a crime of violence where death results in violation of Title 18, United States Code, Section 924(j)) by a federal grand jury which requires review by the United States Attorney General as to whether or not the death penalty

should be pursued. As this court is aware, that review process can be complex and, in most instances, prolonged.

Accordingly, the United States respectfully suggests that the interests of justice require additional time beyond that set out in Title 18, United States Code, Sections 3161(b)(1)(D) and (H) to conclude the pretrial proceedings in this case and that the ends of justice in taking such additional time to conclude the pretrial proceedings outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, the United States of America respectfully requests that this Court designate this matter a complex case pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(ii).

Respectfully submitted,

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/s/ Thomas Rea
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 9, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties and counsel of record.

/s/ Thomas Rea
THOMAS REA